



**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of  
Implementation of Section 621(a) of the Cable Communications Policy Act of 1984 as Amended by  
the Cable Television Consumer Protection and Competition Act of 1992

MB Docket No. 05-311  
FCC 18-131

**THE LEAGUE OF WOMEN VOTERS OF SUDBURY  
EX PARTE COMMENTS**

The League of Women Voters of Sudbury, Massachusetts, respectfully submits these ex parte comments regarding the Second Further Notice of Proposed Rulemaking (FNPRM) released by the Federal Communications Commission (FCC) on September 25, 2018. In the FNPRM, the FCC tentatively concludes that all cable-related in-kind contributions given as part of a cable TV franchise agreement should be treated as franchise fees and subject to the 5% statutory cap. The LWV of Sudbury urges the FCC not to adopt this tentative conclusion. It is not in the public interest as it will reduce the financial ability of public, education, and government (PEG) access providers to offer local video services to organizations like the LWVMA, its local Leagues, and the communities they serve.

The League of Women Voters is a nonpartisan political organization that encourages informed and active participation in government, works to increase understanding of major public policy issues, and influences public policy through education and advocacy.

The Sudbury League relies on our local access channels to help in our work to increase the understanding of Sudbury's citizens in the workings of their government. Our local cable channels broadcast and make available via video-on-demand the Candidates' Nights we hold for town elections, state legislator elections and even Congressional Representative elections. At a time when the local newspapers have drastically reduced their coverage of both elections and town meetings, the local cable channels provide sometimes the only way for citizens to know what is happening.

The Sudbury League also depends on our local access channels to bring a broader audience for the annual civics scholastic competition we produce, and for the many public issue forums we hold throughout the year. Not everyone can attend a presentation by the school superintendent on a Sunday afternoon, but they can access that presentation at will through Sudbury TV's video-on-demand service or on a PEG channel.

Including the values of PEG channels, and PEG channel capacity, as part of the 5% cap on cable TV franchise fees would cripple local access TV networks; this, in turn, would impact the ability of local PEG access providers to broadcast public meetings and would impair the ability of the Sudbury

League to provide programming such as candidate debates and public issue forums to a wide audience.

The League of Women Voters of Sudbury strongly opposes the tentative conclusions in the FNPRM and encourages the FCC not to adopt the proposed changes.

Respectfully submitted,

League of Women Voters of Sudbury  
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